



HON. MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
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March 7, 2025

VIA ECF

Hon. Stewart D. Aaron
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Re: *T.I., et al. v. New York City Dep't. of Educ.*, 25-cv-1544 (JHR)(SDA)

Dear Magistrate Judge Aaron:

I am a Special Assistant Corporation Counsel in the Office of Corporation Counsel, the Hon. Muriel Goode-Trufant, attorney for Defendants in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on administrative proceedings under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

Defendant writes to respectfully request that i) the March 17, 2025 answer deadline be extended 90 days to June 17, 2025 and that ii) the March 14, 2025 conference be adjourned to a date after Defendant has filed its answer. Plaintiff consents to these requests. This is the first request for an answer extension and for an adjournment of the conference. The extension will give Defendant time to complete its internal review and make a request for authority to the Office of the Comptroller. The parties are hopeful that they can settle this matter without the need for a conference and without further burden on the Court's time.

Accordingly, Defendant requests that the answer deadline be extended to June 17, 2025 and that the conference be adjourned to a date following the filing of Defendant's answer.

Thank you for considering this request.

Request GRANTED. No later than 6/17/2025, Defendant shall respond to Plaintiffs' Complaint. The telephone conference scheduled for March 14, 2025, hereby is adjourned to June 25, 2025, at 11 am. At the scheduled time, the parties shall each separately call (855) 244-8681 and enter access code 2319 449 5090.

SO ORDERED. Dated: 3/7/2025

A handwritten signature in blue ink, appearing to read "Adam Dayan".

cc: Adam Dayan, Esq. (via ECF)

Respectfully submitted,
/s/

Martha Nimmer
Special Assistant Corporation Counsel